

Remarks/Arguments

The Examiner has noted that the Application currently names joint inventors. The Examiner correctly presumes that the subject matter of the various claims was commonly owned at the time any inventions covered therein were made.

Claim 14 has been rejected under 35 USC 112 as failing to comply with MPEP 2164.08(a). The Applicants respectfully request the Examiner to reconsider this rejection. MPEP 2164.08(a) states that where a claim contains a means recitation without another recited element or means, such claim is subject to an undue breadth rejection. However, MPEP 2164.08(a) does not apply to Claim 14 because Claim 14 recites an interworking function in addition to a means recitation.

In order to more clearly point out that Claim 14 recites an interworking function, Claim 14 has been amended to recite that the apparatus comprises an interworking function. The Applicants submit that the Examiner's rejection of Claim 14, and claims which depend therefrom, is thereby overcome.

This invention relates to a method and apparatus for supporting an interworking between a wireless local area network and a mobile communications network.

Claims 1 and 14 have been rejected under 35 USC 102(e) as anticipated by US 2004/0082366 to Longoni et al. The Applicants respectfully request the Examiner to reconsider this rejection.

Nowhere does Longoni et al. show or suggest:

“connecting the wireless local area network to the mobile communications network by employing the interworking function as an

auxiliary radio network controller associated with the mobile communications network”,

as specifically recited in Claim 1. Nowhere does Longoni et al. show or suggest any wireless local area network. Rather, Longoni et al. use interworking unit IWU for coupling UMTS radio access network UTRAN to base station subsystem BSS. See figure 4. Neither of these units is a wireless local area network. It is therefore clear that Longoni et al. does not affect the patentability of Claim 1.

Similarly, nowhere does Longoni et al. show or suggest:

“means for connecting the wireless local area network to the mobile communications network using the interworking function as a drift radio network controller for the mobile communications network”,

as specifically recited in Claim 14. It is therefore clear that Longoni et al. does not affect the patentability of Claim 14.

Claims 2-13 are dependent from Claim 1 and add further advantageous features. The Applicants submit that these subclaims are patentable as their parent Claim 1.

Similarly, Claims 15-25 are dependent from Claim 14 and add further advantageous features. The Applicants submit that these subclaims are patentable as their parent Claim 14.

The Examiner has applied US 2001/0027490 to Fodor et al, to subclaims 9-11 and 21-23. Since nowhere does Fodor et al show or suggest any wireless local area network, it is clear that, even if the subject matter of Fodor et al were to be combined with the subject matter of Longoni et al, the patentability of parent Claims 1 and 14 would not be affected.

The Examiner has cited several references without applying them. The Applicants submit that these references are no more pertinent to the claimed invention than the references which have been applied.

The Applicants therefore submit that the Application is now in condition for allowance. A notice to that effect is respectfully solicited.

Respectfully submitted,
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